

The Honorable Karen A. Overstreet
Hearing Date: December 30, 2013
Hearing Time: 11:00 a.m.

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In Re:)	Chapter: 11
)	
CLI HOLDINGS, INC. dba ALYDIAN,)	Case No. 13-19745-KAO
)	
Debtor.)	DECLARATION OF DEIRDRE GLYNN LEVIN
)	

I, Deirdre Glynn Levin, declare as follows:

1. I am an attorney at Keller Rohrbach LLP, which represents the Debtor CLI Holdings, Inc. dba Alydian ("Debtor") in this bankruptcy case.

2. Bitvestment's Ex Parte Order for Bankruptcy Rule 2004 (the "Rule 2004 Order") attached a subpoena requesting 27 categories of documents.

3. Debtor is absolutely willing to cooperate with discovery. Debtor has never refused to produce documents. Debtor has produced certain documents in response to the Rule 2004 Order. Attached hereto as Exhibit "A" is the letter served on counsel for Bitvestment on December 27, 2013 enclosing certain responses to the requests for production.

4. As indicated, Debtor will produce certain categories of documents only after Bitvestment executes a Confidentiality Agreement due to the sensitive nature of the information.

DECLARATION OF DEIRDRE P. GLYNN LEVIN.
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5. Even if all of the requests were proper, it was not possible to meet Bitvestment’s schedule, because of the broad scope of the request , the intervening holidays, and the legal issues raised by the requests.

6. In addition to the time factor, there is a major cost component associated with compliance with the Rule 2004 Order. The costs and legal fees associated with a large production could be substantial.

I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Signed this 27th day of December 2013, at Seattle, Washington.

By /s/Deirdre Glynn Levin
Deirdre Glynn Levin